

**STATEMENT OF BASIS****Page 1 of 4**

BAQ Engineering Services Division

Company Name	Aramark Uniform & Career Apparel, LLC	Permit Writer:	Susan Peterson
Permit Number:	2060-0542.0CM	Date:	DRAFT

DATE APPLICATION RECEIVED: July 18, 2017
December 19, 2017 (email summarizing changes, with updated forms)

FACILITY DESCRIPTION The facility is an industrial laundry. The facility primarily launders uniforms and career apparel, but also offers entrance mats, food-grade wipers, napkins, table linens, healthcare scrubs, and shop towels to its customers. No solvent towels are laundered at this facility. A wastewater pretreatment system is used to remove fats/oils/greases prior to discharge to the municipal sanitary sewer.

PROJECT DESCRIPTION Issue a Conditional Major operating permit.

CHANGES SINCE CONSTRUCTION PERMIT CA ISSUED (see December 19, 2017 email for complete summary, printed for the File):

- 1) The facility notified DHEC that instead of constructing the two 675-pound capacity Brim washers (W6, W7), the facility installed one 800-pound capacity Jensen 800 AP pocket washer.
 - a. The operating permit will renumber the washers, as well as indicating 2 of the washers are smaller "Pony Washers."
- 2) The facility stated that the 600-pound capacity Brim dryer (D4) has not been installed.
 - a. The operating permit will renumber the dryers. Two of the dryers have a new designation of PD1 and PD2.

SPECIAL CONDITIONS, MONITORING, LIMITS

- 1) The facility is not permitted to launder print towels or furniture towels. The facility is also not permitted to launder shop towels saturated with free liquid, including solvent.
- 2) The facility is subject to a facility-wide < 100 tpy VOC limit. The facility has determined that laundering 4,200 tons/year of soiled shop towels (SST) will emit 51 tpy of VOC. As an easier compliance method, the facility has requested a permit condition limiting the tons of SST to be laundered each year. The facility has the capability of weighing the SST.
 - a. The facility will track the tons of laundered SST monthly, as well as compute a 12-month rolling sum of the tons of laundered SST.

OPERATING PERMIT STATUS

This facility does not currently have an operating permit but will be issued a Conditional Major Operating Permit. The permit will include a < 100 tpy VOC limit for the avoidance of TV.



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FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled and Limited Emissions (based on limiting the laundering of SST to 4,200 tons/year)
	TPY	TPY
VOC	163.7	51.3
PM	66.1	13.8
PM ₁₀	3.2	1.2
PM _{2.5}	3.2	1.2
SO ₂	0.1	0.1
NO _x	5.7	5.7
CO	7.5	7.5
Lead (Pb)	4.48E ⁻⁰⁵	4.48E ⁻⁰⁵
HAP	6.1	6.1

Note: These emissions have changed slightly from the CA statement of basis to reflect the change in number of washers/dryers. See "Changes since construction permit CA issued."

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Section II.E – Synthetic Minor	Not applicable Construction permit CA does not contain a federally enforceable limits.
Standard No. 1	Applicable Boiler 1 is subject to Opacity, PM, and SO ₂ limits under this standard.
Standard No. 3 (state only)	Not applicable This facility does not contain waste combustion or reduction sources.
Standard No. 4	Applicable The Washers (W1, W2, W3, W4, W5, W6, PW1, PW2) do not emit PM and therefore will be subject only to Standard 4 Opacity limits of 20%, each. The Dryers (D1, D2, D3, PD1, PD2) will be subject to 20% Opacity limit, each, and a PM allowable based on their process weight rate. SST and WWT are also subject to a 20% opacity, but no PM allowable.
Standard No. 5	Not applicable The industrial laundry is not one of the Parts listed in Section II of Standard No. 5. In addition, this facility was not in existence in 1979 or 1980.
Standard No. 5.2	Applicable The allowable discharge of NO _x resulting from Boiler 1 is 0.036 lb/MMBtu. Attachment A of the application includes the boiler specifications. Aramark proposes to purchase and construct a 12.186 Million BTU/hr natural gas boiler.



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REGULATORY APPLICABILITY REVIEW

Regulations	Comments/Periodic Monitoring Requirements
	The manufacturer is Johnston, the model is PFTA 300-4. The specifications state that it is equipped with Low NO _x (30 ppm) burner capable of complying with the NO _x discharge limit of 0.036 lb/MMBtu. The facility emailed a copy of their purchase order that shows they purchased a Johnston model PFTA 300-4 boiler.
Standard No. 7	Not applicable The facility's PTE for any pollutant is less than 250 TPY; therefore the facility is not major for PSD.
61-62.6	Not applicable This facility does not have fugitive PM (Dust) emissions.
40 CFR 60 and 61-62.60	Applicable NSPS Subpart Dc Small Industrial-Commercial-Institutional Steam Generating Units applies to steam generating units for which construction, modification, or reconstruction was started after June 9, 1989 and that have a maximum design heat input capacity between 10 million and 100 million Btu/hr. Boiler B1 is subject to NSPS Subpart Dc
40 CFR 61 and 61-62.61	Not Applicable This process does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
40 CFR 63 and 61-62.63	Not Applicable This facility is not major for HAP emissions. In addition, this facility is not subject to any Area Source MACTs. Note: This facility specifically requested that the standard permitting language for NESHAP Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) NOT be included in this operating permit. The basis for their request was that they do not operate, nor do they plan to operate any emergency engines.
61-62.68	Not Applicable This facility does not store or use chemicals subject to 112(r) above the threshold quantities.
40 CFR 64 (CAM)	Not Applicable This facility is not a major source.

AMBIENT AIR STANDARDS REVIEW

Regulations	Comments/Periodic Monitoring Requirements
Standard No. 2	The facility showed demonstrated compliance with this standard as seen in the December 5, 2017 modeling summary.
Standard No. 8 (state only)	The facility showed demonstrated compliance with this standard as seen in the December 5, 2017 modeling summary.



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PUBLIC NOTICE

This Conditional Major Permit will undergo a 30-day public notice period in accordance with SC Regulation 61-62.1, Section II.N. The comment period was open from December 21, 2017 to January 19, 2018 and was placed on the BAQ website during that time period.

ADDITIONAL PUBLIC PARTICIPATION

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.